



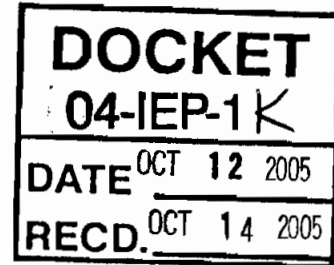
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## San Diego Chapter

*Serving the Environment in San Diego and Imperial Counties*

California Energy Commission Dockets Unit  
Attn: Docket No. 04 IEP 1K  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

October 12, 2005



### **Subject: 2005 Draft Integrated Energy Policy Report**

Dear CEC Staff and Commissioners:

Thank you for this opportunity to comment on the *2005 Draft Integrated Energy Policy Report*. As the San Diego Sierra Club's spokesperson on wind energy, I am writing specifically about the wind energy aspects of the plan.

The San Diego Sierra Club represents over 17,000 members in San Diego and Imperial Counties. These two counties have been identified as a potential wind energy resource area, so we are paying close attention to the issue of wind energy in our area.

Wind energy is a fast-growing form of renewable energy that does not produce greenhouse gases. However, it can cause significant harm to wildlife, scenic viewsheds, and Native American cultural and sacred sites if wind energy facilities are not properly located.

It is national Sierra Club policy to support wind energy when it is appropriately sited. Decisions as to the appropriateness of a site are made at the local chapter level.

While the San Diego Sierra Club is glad to see the *2005 Draft Integrated Energy Policy Report's* concern for the welfare of birds, we are concerned that the report does not mention potential impacts on other types of wildlife and appears to downplay the importance of proper siting. We believe that these issues should be addressed in the final version of the report for a number of reasons.

First, birds are not the only wildlife that can be affected by wind turbines. Bats are also at risk. According to the CEC's *Assessment of Avian Mortality from Collisions and Electrocutions* (June 2005), the extent of the threat wind turbines pose to California bats is not currently known. This is troubling if the industry is to continue growing as quickly as it has been.



In San Diego county, maintaining a stable bat population is important to us as a means of preventing human illness. It is well known that bats eat large quantities of mosquitoes, which spread West Nile virus. We know that potential for the virus to spread is increasing because the number of birds in our county that have tested positive for the virus is already nearly four times what it was last year, and this is only October. In addition, the county struggles to control its mosquito population. (See attached articles from *The Voice of San Diego* and *The Alpine Sun*.) Therefore, any statewide protocol developed regarding avian mortality from wind turbines needs to include bats if it is going to address the concerns of San Diego county. It may be that the report intended to include bats by using the phrase "avian mortality." If so, it would be helpful if it were clarified. Currently bats are not mentioned, but birds are.

We also have special-status wildlife that is vulnerable to habitat loss. The endangered Quino checkerspot butterfly, endangered Peninsular bighorn, and endangered Desert tortoise all occur in areas in San Diego and Imperial Counties in which the wind energy industry has expressed interest.

Habitat loss is an important issue because it is the number one reason for species extinction, and threats to endangered and special-status species often result in costly and time-consuming litigation. Habitat loss can occur at wind energy facilities through construction of turbine pads, access roads, substations, and transmission lines. The risks here are the introduction of invasive species and the failure of revegetation efforts. (The areas where the wind resource occurs in San Diego and Imperial counties receive little rain.) In addition, these two counties have an ongoing problem with illegal use of off-road vehicles. New access roads constructed on public land often expose more habitat for special-status species to potential destruction through illegal riding.

These habitat loss issues have so far not been taken seriously. The U.S. Bureau of Land Management (BLM) has permitted critical habitat and designated recovery units for endangered species without U.S. Fish and Wildlife consultation (Pacific Wind Development LLC Right-of-Way CACA-45248). As a result, this summer the Center for Biological Diversity sent the BLM notice of intent to sue.

During a recent personal conversation with Lee Otteni, project manager for the BLM's new Programmatic Environmental Impact Statement on Wind Energy, he told me that the BLM would continue permitting critical habitat for some endangered species. However, the CEC's *Assessment of Avian Mortality from Collisions and Electrocutions* states, "Wind turbines should be sited in areas that reduce impacts to birds and other species as well as critical habitat" (2). To ensure that this happens, the San Diego Sierra Club would like to see the California Energy Commission work with the BLM to eliminate wind energy testing and development on critical habitat.

There are also siting issues relating to cultural heritage. San Diego and Imperial counties are home to significant concentrations of Native American cultural and sacred sites. Earlier this year, an attorney for the Quechan tribe in Imperial county sent a letter to the BLM protesting the lack of tribal consultation in wind energy permitting at Black Mountain. (See attached letter from Courtney Ann Coyle.) Similarly, tribes were not consulted when over 17,600 acres of public land

in San Diego county were permitted to Pacific Wind Development LLC (PPM Energy) for wind energy testing by the BLM in 2004.

Seven environmental groups have protested the PPM permitting and two particular sites within it. (See attached letter from San Diego Sierra Club, et al.) One of these sites, McCain Valley, is also opposed by the San Diego Alliance of Climbers (see attached letter from Dave Kennedy) and the Boulevard Sponsor Group (the planning advisory board for the unincorporated community of Boulevard). The PPM permitting has been protested by the Boulevard Sponsor Group and Campo/Lake Morena Planning Group, as well as by County Supervisor Dianne Jacob. (See attached letter from Supervisor Jacob.)

In addition, it is our understanding that the BLM's El Centro office has received a large quantity of mail from the public protesting the PPM permitting. Lynda Kastoll, BLM realty specialist, can provide details: (760) 337-4412.

There also appear to be emerging problems with planning for the transmission of wind energy in San Diego county. According to the *Potential for Renewable Energy in the San Diego Region* report (August 2005), most of the potential wind energy is in the southern part of the county near Boulevard. (See attached map.) SDG&E is proposing to run the Sunrise Powerlink in the northern part of the county. (See attached SDG&E map.) James Avery, Senior Vice President of Electricity for SDG&E, said in a personal conversation that any new wind developments in the southern part of the county would require new transmission lines in addition to the proposed Sunrise Powerlink (10/5/05, Sunrise Powerlink Community Working Group Meeting).

Gaining community support for new transmission lines in the Boulevard area for the conveyance of wind energy may be difficult given SDG&E's handling of the transmission line reconductoring for the new Kumeyaay Wind facility on the Campo Reservation. (The Campo Reservation is adjacent to Boulevard.)

In order to bring the Kumeyaay Wind facility online, SDG&E needed to reconnector existing transmission lines. However, SDG&E failed to submit the reconductoring plan for inclusion in the draft environmental assessment of the project. As a result, the community did not find out that they were going to be pulled off the grid and put on emergency generators for approximately 10 weeks until *after* the Bureau of Indian Affairs approved the project. The County of San Diego also pointed out that the diesel generators being used would violate county noise ordinances and U.S. Fish and Wildlife guidelines for noise near bird habitat. (See attached letters from the Boulevard Sponsor Group and the County of San Diego.)

While there are potential wind energy resources in the northern part of San Diego county nearer SDG&E's preferred route(s) for the Sunrise Powerlink, there are going to be considerable biological and community hurdles to overcome before they can be developed, if they can be developed at all. AES SeaWest recently withdrew its application to test wind on BLM land on Volcan Mountain after the community and environmental groups raised objections to developing wind power in a bird migration corridor less than a mile from a wilderness nature preserve. (See attached newspaper articles from the *San Diego Union Tribune* and the *Julian News*.)

In the northern part of San Diego county, wind testing is currently under way on Vista Irrigation District (VID) land in the San Felipe Valley. However, that site also faces challenges. According to Phil Unitt, Curator of Birds and Mammals at the San Diego Natural History Museum, the San Felipe Valley is the most heavily used bird migration corridor in San Diego county, so the site might be opposed by environmental groups if it goes to wind energy development. (See attached letters from the San Diego Audubon Society and the Center for Biological Diversity.) In addition, the VID test site is only about a mile from an airport that supports a thriving sailplane business (Warner Springs Airport), so resistance from the aviation community may be encountered as well.

I have written in such detail to suggest to the California Energy Commission that it is not in the best interest of meeting the state's Renewable Portfolio Standard goals to rush into production of wind energy in San Diego and Imperial counties without considering appropriate siting, impact on non-avian wildlife and habitat, transparent public process, and transmission issues. Many potential problems with community opposition and litigation can be prevented through careful attention to siting and public notification. In the long run, this will be an easier and less costly path than the one industry and the utility company appear to be on.

Thank you again for this opportunity to comment on the *2005 Draft Integrated Energy Policy Report*,

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kelly Fuller". The signature is fluid and cursive, with the first name "Kelly" written in a larger, more prominent script than the last name "Fuller".

Kelly Fuller  
Spokesperson on wind energy

cc: interested parties

## Friday, Oct. 7, 2005

**West Nile spreading.** Health officials warned of the West Nile virus spreading through San Diego County on Thursday, encouraging area residents to protect themselves from mosquito bites. The county Department of Health reports increases in the mosquito population are becoming more likely due to Santa-Ana driven warm weather.



The county season-high of birds infected with the mosquito-born disease reached 124 Thursday, while last year's total was only 34.

**Still burning.** Erratic Santa Ana winds gave fury Thursday to U.S.-Mexico border fires, forcing officials to evacuate residents near the 3,100-acre wildfire.

The fire began Wednesday morning in the Tecate region when a structure fire ignited area vegetation. Two-thirds of the border fire is burning in U.S. territory.

By mid-morning, the California Department of Forestry reported 10 percent of the southeastern fire had been surrounded by 700 personnel fighting the blaze. Evacuees were sent to Potrero Community Center, the American Red Cross temporary evacuation point for residents escaping the brushfire.

Fire crews hope to have the inferno fully contained by 6 p.m. Sunday, the CDF said. The crews are presently equipped with 72 engines, six air tankers, 10 bulldozers and seven helicopters.

**Closing stores.** The Good Guys are calling it quits and taking three San Diego County stores with them. The entertainment chain announced Wednesday that 45 stores statewide will be closed.

Customers with existing product and service orders are encouraged to contact Good Guys at (800) 229-4897. All service plans and warranties will be honored through the manufacturer, store officials said.

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# Viewpoint

## County needs to step up to the plate on rural West Nile

**T**he rural region, it turns out, is host to West Nile and is, in fact, one of the most affected areas in the county. The latest positive West Nile case brings the Alpine total to eight. There have also been three cases found in Campo and Jamul, two cases in

ty being done closer to the beach populations.

In short, the 700,000 private property owners of the unincorporated area are paying the entire cost of staff and control services that focus on protecting incorporated urban areas far away from us.

### EDITORIAL

Pine Valley, and one case each in Potrero and Descanso.

This is no real surprise to residents of Alpine and the Back Country. We've been watching birds fall out of the sky for a couple of years now, while the county has almost never managed to get to them in time to test. We know many who tried to get a response from vector control and, up until recently, they just couldn't seem to call us back in time to get the bird before its condition failed to meet their criteria for freshness.

We only recently learned that, even if the county DOES test a bird from the rural area, the test it uses sometimes comes up negative when, in fact, there is West Nile present and the bird has died of it.

This was the case with the Marshall Way bird, which later tested positive in the state test.

Revelations about the magnitude of local infections come on the heels of approval of a fee that increased the amount paid by homeowners for vector control by a factor of about 9, the basic charge per property being \$8.55 per home, plus \$2 per apartment unit. This fee increase was adopted by the board of supervisors after only 19 percent of the property owners polled agreed to the fee.

We also learned that absolutely no control measures have been extended beyond El Cajon/Santee and that even these were few and far between, the vast majori-

*The Alpine Sun* took a stand against the fee when ballots were first sent out to property owners in May. Not only is it illegal under Prop 218 to tax a discrete segment of the population for a service intended to benefit the general population, but it is immoral and wrong to expect us pay for services that we don't even receive.

Now, on top everything else, we have abundant West Nile in our rural communities and are still receiving no assistance in controlling mosquitoes, in getting our animals vaccinated, or in defending from transborder carriers, since Mexico makes no effort to prevent disease spread within its borders or over them.

Given the impossibility of controlling mosquitos in our region to a degree that would prevent significant numbers of people and animals from being infected, a program of spraying instead of a program of monitoring stormwater collection on construction sites and helping low-income residents obtain adequate supplies of vaccine for livestock, is just plain wasteful.

The county twiddled its thumbs for five years, instead of finding funds to get programs underway in a timely manner, choosing, instead, to wait until, in a panic to catch up, it hit property owners with bigger fees to cover a program that is too little and too late.

The board of supervisors needs to take a serious look at its funding mechanism for vector control and it needs to tailor its programs to actions that will actually do some good.

Clearly, West Nile is here to stay. It's time to stop pretending we can stop it with spot applications of bug spray and take concrete steps to protect vulnerable populations from its affects.

**COURTNEY ANN COYLE  
ATTORNEY AT LAW**

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Lynda Kastell, BLM  
1661 South 4<sup>th</sup> Street  
El Centro, CA 92243

**By Confirmed Fax: 760.337.4490**

May 6, 2005

**Wind Energy Testing & Facilities Permits on BLM Land in Imperial County**

Dear Ms. Kastell:

This letter is being sent by direction of the Quechan Indian Nation Culture Committee. We have become aware of windpower test facilities proposed just north of the Ft. Yuma Reservation boundaries and built near the Black Mountain area. There may also be others of which we are not yet aware.

While it should go without saying, particularly in light of the Tribe's involvement in the Glamis Gold matter, the Committee expresses its keen interest in both test tower projects and potential wind farm developments. As you know, the areas referred to above are culturally rich and contain places of religious and sacred value to the Tribe. Any projects proposed for these sensitive areas must be carefully reviewed and considered. They also can be quite controversial. Public comment and tribal consultation are warranted.

I understand from our call today, that Ms. Jose had asked for a copy of the environmental document for the Black Mountain units. That has yet to be provided. Through this letter, we again request a copy of that document be provided to both my office and to Ms. Jose without further delay. With respect to the other project, from our conversation, I understand to be in the proposed or pending stage. We request to see the draft of that environmental document when it is ready, would like a copy of any correspondence between BLM and the applicant (Clipper Wind) and reserve the right to engage in government-to-government consultation.

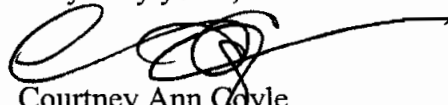
For your information, we have reviewed the Environmental Analysis for the PPM Energy Meteorological Tower Installation Project, San Diego County, California EA Case File 3CA45248 (July 2004) also handled by your office and found it to be inadequate, including its assessment of cultural, Native American, visual, temporal,

recreational experience, lighting, avian, indirect and aesthetics impacts. Please be advised that we believe similar projects within our cultural areas deserve appropriate environmental review, can cause cumulative adverse impacts and trigger NHPA section 106 survey and consultation, which we believe has not occurred on the two projects in Imperial County.

The Committee knows that such projects in sensitive locations can cause spiritual violations and requests the opportunity to explain this to BLM face-to-face. The Committee also knows that other utility projects in both Imperial and San Bernardino Counties have caused unanticipated and irreversible adverse impacts to cultural places when the applicant or its contractors went outside of permitted right of ways and did not follow conditions of project approval.

You may call my office at the number above or contact Pauline Jose at 760.572.0661 to explain to the Tribe how BLM intends to handle these matters. Thank you for your courtesy and consideration.

Very truly yours,



Courtney Ann Coyle  
Attorney at Law

Cc: Mike Jackson, Sr., President  
Vicki Wood, El Centro Field Office Manager  
Pauline P. Jose, Culture Committee Chair  
Emilio Escalanti, Council Liaison



San Diego Sierra Club  
Center for Biological Diversity  
California Wilderness Coalition  
California Wild Heritage Campaign, San Diego Region  
Desert Protective Council  
Desert Survivors  
San Diego Audubon Society

Ms. Vicki Wood  
Field Office Manager  
Bureau of Land Management  
1661 S. Fourth St.  
El Centro, CA 92243

August 15, 2005

**Subject: Wind Energy Testing and Development, Eastern San Diego County**

Dear Ms. Wood:

The purpose of this letter is to convey to you our objection to the BLM's permitting of wind energy testing at several inappropriate sites in San Diego County. We also wish to express our objection to the BLM's decision to exclude public comment on these permits. Sites permitted for testing by the BLM are rich in many natural, cultural, and recreational resources incompatible with construction of industrial wind-energy generation facilities.

We understand the BLM's position is that public comment is not necessary for wind energy testing. However, PPM Energy's right-of-way permit application states, "Applicant proposes to assess the wind energy potential at different locations within the project area lands and then to submit a proposed plan of development and new application for a long-term commercial energy facility right-of-way on those public lands with adequate wind energy resources"<sup>1</sup>. Clearly, the sole purpose of this testing is to find public land for a new wind-energy generation facility.

BLM's exclusion of public review is highly unreasonable given the huge areas covered by right-of-way permits (> 17,600 acres) and the likely controversial nature of wind-energy development in these areas. No consultations with wildlife agencies or tribal consultation were performed, and another 1,805 acre permit is pending, apparently without tribal and wildlife agency consultation.

While wind energy can be a "green" source of energy when developed in the right locations, it must be very carefully sited to avoid severe impacts to birds and bats, fragmentation of habitat and resulting displacement of species, impacts on cultural and sacred sites, severe visual disruption of the landscape, and conflicts with pre-existing uses of the land.

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<sup>1</sup> "Application for Transportation and Utility Systems and Facilities on Federal Lands," signed by Peter C. van Alderwerelt for Pacific Wind Development LLC (PPM Energy), 3 April 2003.

The McCain Valley, Banner Grade, and Jacumba (south of Table Mountain) wind energy test sites cannot be considered "green" because of their likely severe impacts.

We oppose wind energy testing and development in the McCain Valley National Cooperative Land and Wildlife Management Area because wind energy development there will likely result in significant environmental impacts including the following, among others:

- Impacts to designated critical habitat for the endangered Peninsular bighorn
- Impacts to the designated Southeast San Diego Recovery Unit for the endangered Quino checkerspot butterfly
- Impacts to other suitable habitat for the endangered Quino checkerspot butterfly
- Impacts to bird and bat populations
- Increased fire risk from increased public access via new or improved turbine access roads, turbine lightning strikes, and turbine malfunctions
- Fragmentation of large natural habitat landscapes
- Impacts to scenic views and wilderness experience in two adjacent designated wilderness areas<sup>2</sup>
- Impacts to significant concentration of Native American cultural sites
- Conversion of outstanding rural scenic values to industrial use
- Impacts to experience of quiet and remoteness from the urban environment
- Conflicts with use by rock climbers, hikers, campers, and hunters

We oppose wind energy testing and development at the permit pending Banner Grade wind testing site near Julian because wind energy development there will likely result in significant environmental impacts including the following, among others:

- Unmitigable impacts on birds using the Banner Canyon migration corridor
- Fragmentation of habitat
- Impacts to bird and bat populations
- Increased fire risk from increased public access via new or improved turbine access roads, turbine lightning strikes, and turbine malfunctions
- Conversion of outstanding rural scenic values to industrial use
- Impacts to outstanding scenic values of a major gateway into Anza-Borrego State Park
- Impacts to scenic views from the adjacent Volcan Mountain Preserve
- Loss of current eligibility for state scenic highway status
- Impact to local residents and businesses at the base of the Volcan Mountains

We oppose wind energy testing and development south of Table Mountain (near Jacumba) because wind energy development there will likely result in significant environmental impacts including the following, among others:

- Impacts to the designated Southeast San Diego Recovery Unit for the endangered Quino checkerspot butterfly

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<sup>2</sup> Sombbrero Peak Wilderness and Sawtooth Mountains Wilderness

- Impacts to Golden eagles using nearby nesting sites
- Impacts to a nearby colony of Pallid bats, a California species of special concern
- Impacts to other bird and bat populations
- Impacts to Native American cultural sites
- Impacts to scenic views in the adjacent designated Table Mountain Area of Critical Environmental Concern
- Increased fire risk from increased public access via new or improved turbine access roads, turbine lightning strikes, and turbine malfunctions
- Fragmentation of habitat
- Loss of current eligibility for inclusion on the National Register of Historic Places (Jacumba Discontiguous Historic District)

Because of these likely severe impacts and the lack of a proper public process and agency and tribal consultation, we urge you to revoke the testing permit granted to Pacific Wind Development LLC (PPM Energy). We also urge you to deny the wind energy testing permit filed by SeaWest Windpower.

Thank you for your consideration of our views. We would like to take you out into the field to show you these sites and explain in more detail why they are inappropriate. Please contact Kelly Fuller of the San Diego Sierra Club to arrange such a visit: (619) 445-4390.

Sincerely yours,



San Diego Sierra Club  
Kelly Fuller, Spokesperson on Wind Energy

Center for Biological Diversity  
David Hogan, Urban Wildlands Program Director

California Wilderness Coalition  
Bryn Jones, Desert Program Director

California Wild Heritage Campaign, San Diego Region  
Geoffrey D. Smith, Organizer

Desert Protective Council  
Nick Ervin, Vice-President

Desert Survivors  
Steve Tabor, President

San Diego Audubon Society  
Jim Peugh, Conversation Chair

cc: Mike Pool, BLM California State office  
Linda Hansen, BLM Desert District office  
Peter van Alderwerelt, PPM Energy  
Michael Azeka, SeaWest  
County Supervisor Dianne Jacob  
State Senator Dennis Hollingsworth  
State Senator Denise Ducheny  
State Assemblyman Ray Haynes  
State Assemblyman Jay La Suer  
Congressman Bob Filner  
Congressman Duncan Hunter  
Congressman Darrell Issa  
Senator Barbara Boxer  
Senator Dianne Feinstein

Vicki Wood  
Bureau of Land Management, El Centro

July 29, 2005

Hello Vicki,

I write to you in opposition of two of the proposed wind energy projects in eastern San Diego county: the McCain Valley sites and the Julian site. Most particularly I speak to you about McCain Valley, where I represent the interests of the SD rock climbing community in several respects. First, I am a Regional Coordinator for the Access Fund, the climbers' non-profit nationwide representative group. In this volunteer position I serve as a facilitator between land managers and local climbers, as well as engage in community service projects like trail maintenance, trash removal and also fundraising. Last year I founded the San Diego Alliance of Climbers (SANDAC), a small group of like-minded climbers to help address local issues. A climber for over 20 years, I have helped achieve successful relationships with the staffs of Mission Trails Regional Park, Cleveland National Forest, city of Poway, etc. The Access Fund was recently granted a Memorandum of Understanding with the BLM. [www.accessfund.org](http://www.accessfund.org)

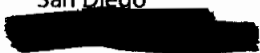
Further, I am the author and publisher of the San Diego County Climbing Guide and San Diego Adventures: classic hiking, mountain biking & rock climbing. And perhaps most importantly, I have a very long personal history with climbing and exploring McCain Valley, having been involved with at least 100 first ascents since 1986. I consider it one of the best places in San Diego County. My climbing guidebook details the entire area over many pages of intricate boulder maps and photos, including much historical data about the early climbing history of McCain dating to the 1950s. The Lowenbrau Pinnacle is something of an icon for local climbing.

The BLM and PPM energy can expect staunch opposition to this project from myself, and I believe the climbing community in general. Besides the great potential for environmental impact, the damage to the viewshed of this magnificent piece of open space would be catastrophic. The recent spate of bad press about the Altamont wind projects (including some seasonal closures) only serves to illustrate the immense risk to bird and bat habitat wind turbines pose. Including migrants, San Diego County is home to more bird species than any comparable region in North America. And I can say from personal experience there are plenty of bats in this area.

I will work in a respectful manner on this issue but I want to state bluntly that we will bring suit against the BLM and PPM Energy in fairly short order if the permitting process for these projects is allowed to go forward. The BLM has not allowed the public to participate in the process on the use of our precious open spaces so we will respond with a vigorous legal challenge if necessary. I have been working with the Sierra Club and other environmental groups and our coalition is quite adamant in our stance. In the absence of any consideration for the concerns so many of us have, litigation is guaranteed.

Wind energy may have a place in the marketplace, but putting these enormous devices, which actually generate very little energy considering their impact, in a beautiful natural area like McCain Valley is not acceptable. You will destroy my experience there. Climbers and hikers go to areas like this to escape the trappings of society. Can't you see how this project would change that? Would we put these in Joshua Tree? Yosemite? How about Mission Trails Park? Of course we wouldn't. Wind turbines should be constructed in areas that already have some commercial development. How about lining Interstate 8 with them? That would be fine with me. A massive wind farm in McCain Valley will keep people away, no question about it.

As it happens, I am currently writing the second edition of the San Diego County Climbing Guide. This matter will receive frank discussion. I am willing to meet or talk with you about this problem. I hope this issue is negotiable, and I'm sure the personnel of the BLM care as much about the protection and use of our resources as I do so, please let us work together to create a winning situation. San Diegans should not be made to suffer because a few of the viable wind energy locations happen to be on our designated natural resource preserves. We deserve better. There are many ways to address the energy situation, but sacrificing this experience to accomodate this industry is not one of them in my opinion.

Thank you for your time, sincerely,  
Dave Kennedy  
San Diego  




## DIANNE JACOB

SUPERVISOR, SECOND DISTRICT  
SAN DIEGO COUNTY BOARD OF SUPERVISORS

September 9, 2005

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Vicki Wood, Field Office Manager  
Bureau of Land Management  
1661 S. Fourth St.  
El Centro, CA 92243

Dear Ms. Wood:

I am aware that the Bureau of Land Management (BLM) has issued a permit for the testing of wind power on public lands in the Campo and Boulevard areas of East San Diego County (CA-45248). I am also aware that BLM is processing an application for similar testing in the Banner area (CA-46030). I am concerned about the secrecy of the permitting process thus far and respectfully urge BLM to work with the communities and the County to ensure that the permitting process is transparent and includes public notification and participation every step of the way.

That residents in the Campo and Boulevard areas were not notified of the application by Pacific Wind Development to install four testing towers in the area is extremely disappointing. I request that all environmental documents concerning the project be made available to members of the public, the Campo/Lake Morena Planning Group, the Boulevard Sponsor Group and the County of San Diego.

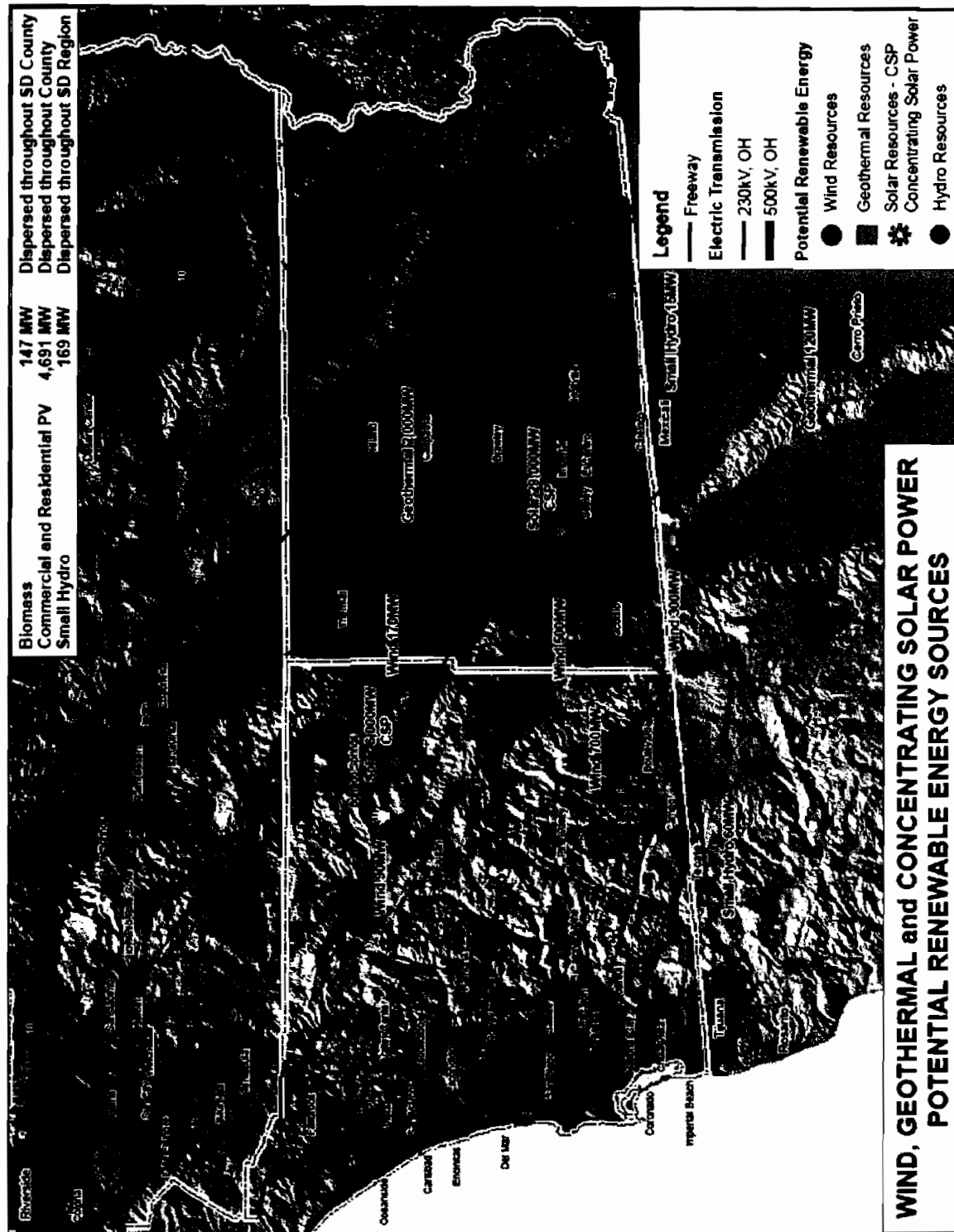
I am pleased that BLM held a public meeting in Julian to gauge public reaction to the proposed testing in the Banner area, and I urge the agency to take seriously all concerns about the proposal's impact to this pristine area. San Diego County will be providing comments to BLM regarding the Banner application in the very near future. In the meantime, please be aware that the Volcan Mountain Open Space Preserve is an important natural resource, cherished by residents in the Julian area and beyond. I will oppose any project that threatens its vitality.

Wind power is clean and renewable energy that can help San Diego and the nation lessen its dependence on finite fossil fuels. However, some locations may not be appropriate for large test towers and turbines. Therefore, BLM must work with the County, communities and other stakeholders to find appropriate locations for wind power locations that do not destroy biologically rich open spaces.


Sincerely,

DIANNE JACOB  
Supervisor, Second District

Figure 1.1: Approximate Locations for Major Renewable Resources in the Region

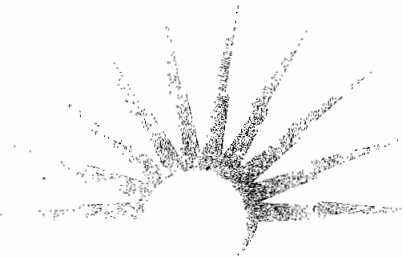
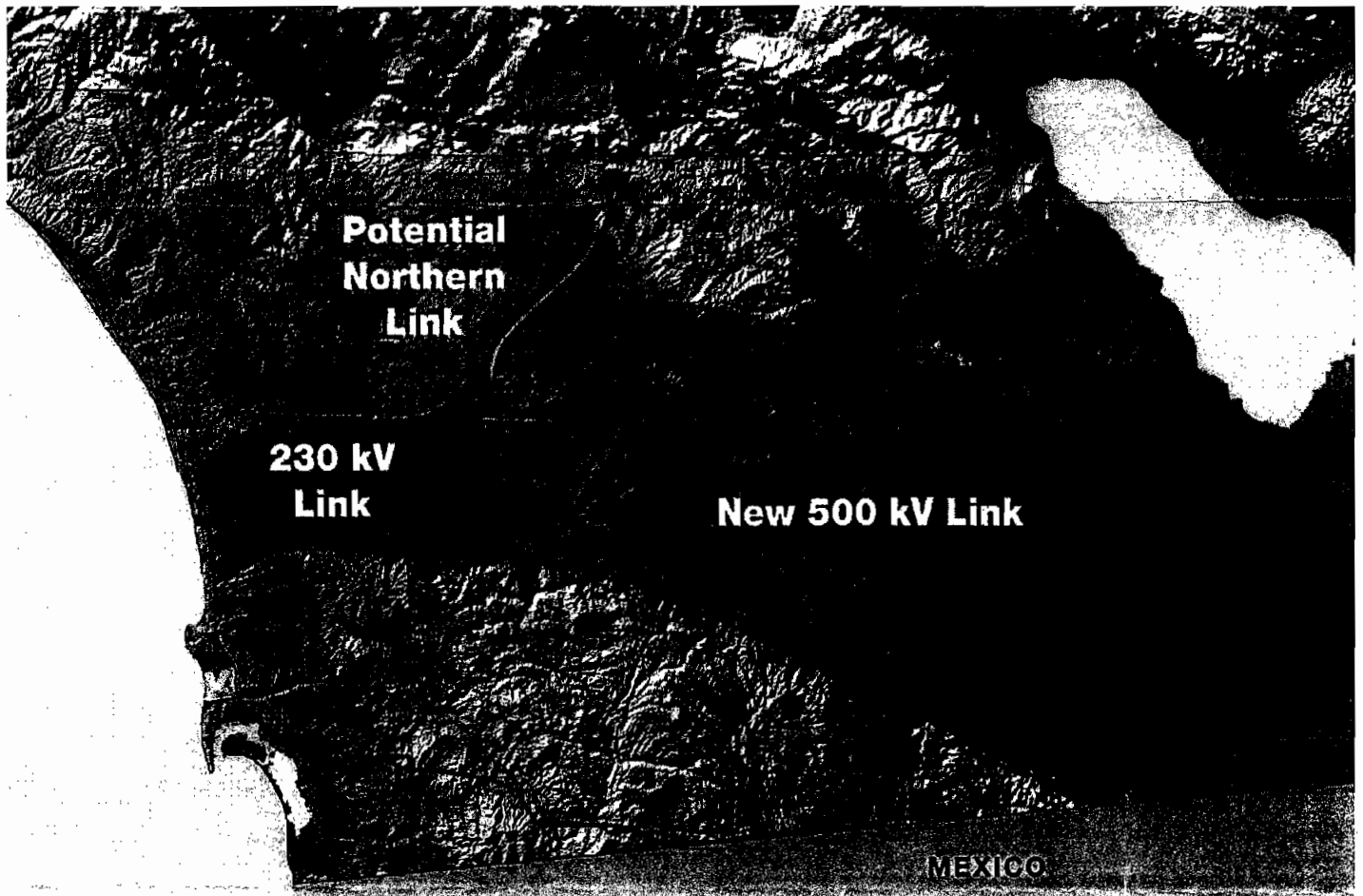




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# General Project Areas



## SUNRISE POWERLINK



# BOULEVARD SPONSOR GROUP

March 16, 2005

VIA FAX AND US MAIL

J. C. Thomas, Public Affairs Manager  
San Diego Gas & Electric  
Mail loc. CP 31D  
8330 Century Park Court  
San Diego, CA 92123

RE: KUMEYAAY WIND FACILITY RECONDUCTORING / 3,000 HP GENERATORS

Dear Mr. Thomas,

At our regular meeting, held on March 3, 2005, our community planning group voted to send this letter, stating our concerns, and requesting information on impacts from SDG& E's reconductoring work on the electrical lines serving our rural community of Boulevard. Which other communities will be impacted? Some of this work appears to have already started, on the Campo Reservation, south of the Golden Acorn Casino by the Crestwood substation.

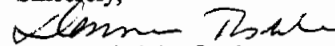
When contacted with questions on this project, the County of San Diego seemed to be unaware of the off-reservation reconductoring work being done. Since they have become involved, some of our concerns are now being addressed through risk assessment, including: noise, diesel exhaust, emissions, and potential fuel spills from the two proposed 3,000 HP diesel generators

However, serious concerns remain regarding negative impacts from the use of those temporary generators to provide electricity to our rural communities while our community is off-line during the proposed 3-4 months in the 2<sup>nd</sup> and 3<sup>rd</sup> quarters of this year. As you know, most of the backcountry was without power for 10 days, or more, during the firestorms. Relying on temporary generators for 3-4 months seems rather iffy. We are especially concerned due to the fact that we need power to pump water from our wells. There are real concerns that the potential disruption of electrical service, as a result of switching back and forth to generators, and the potential for power surges and brown outs, can result in damages to our sensitive electrical appliances and equipment. Will we be reimbursed for damages? Independent monitoring of our power should be conducted during this project to protect our equipment.

During one of our meetings, public comments were made that this reconductoring work was reportedly not mentioned in the Draft EA for Kumeyaay Wind, or at the PUC hearings, it simply appeared in the Final EA. There were also allegations regarding the difficulty this project had getting through the PUC and whether or not this project went through the proper RFO process. While these last two issues may seem beyond our scope we are nevertheless interested in SDG& E's answer because the resultant project does impact our community. It seems that our rights to public participation and comment were not fully considered or honored. Has the ISO granted permission yet for construction outages? Will there be more turbines installed later? I thought over 100 were mentioned previously. To date, we are extremely disappointed in SDG& E's lack of consideration and disclosure.

Please advise us of SDG& E's plans to protect our community, and our sensitive equipment, during this project. Perhaps a bulk mailing should be sent out notifying your customers of the upcoming work and how to prepare for any possible impacts. Independent monitoring of our power is also requested. If SDG&E would like to make a presentation at one of our meetings, I will be glad to put it on our agenda. We also request to be included on the mailing list for this project along with contact information for the NEPA process for the BLM. Thank you in advance for your prompt reply.

Sincerely,

  
Donna Tisdale, Chair

cc: Interested Parties



**GARY L. PRYOR**  
DIRECTOR

## County of San Diego

### DEPARTMENT OF PLANNING AND LAND USE

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EL CAJON OFFICE  
200 EAST MAIN ST. • SIXTH FL.  
EL CAJON, CA 92020-3912  
(619) 441-4030

March 15, 2005

Mr. Dashiell Meeks  
San Diego Gas and Electric  
8315 Century Park Court  
San Diego, California 92123

Dear Mr. Meeks:

The County of San Diego has learned of a San Diego Gas & Electric (SDG&E) project that could impact County residents and County lands and is writing to present our concerns. The project, the Crestwood-Boulevard Tap 69kV Reconductor TL629 E, is proposed to increase the carrying capacity of the existing electrical transmission facilities to accommodate the electricity to be generated by the Kumeyaay Wind Energy Facility proposed on the Campo Indian Reservation. A draft Environmental Assessment (EA) was prepared for the Kumeyaay Wind Energy Facility, but the SDG&E reconductoring project was never mentioned in the draft EA. This substantial addition to the project was added to the Final EA and the County was never given the opportunity to understand the whole of the project and to make fully informed comments on potential impacts to off-Reservation land. The County is troubled by the process used to make this substantial addition to the project and hopes that our concerns will be addressed. The County's concerns are focused on the use of temporary generators at the Boulevard Substation and are as follows:

#### Noise

Appendix D of the Final EA describes the SDG&E reconductoring project for upgrading the power lines to accommodate the power generated by the new facility. Two 1.6 MW generators in the Boulevard area will supply power for this portion of East County over the three to four months that the line is being upgraded. The Appendix does not include any schedule for the power outages or the expected usage of the generators to meet local demands up to 4 MW. County staff has confirmed with SDG&E that these two temporary generators will be located at the Boulevard Substation (APN 612-092-12-00). County staff has assumed that the generator operation may be continuous for

nearest residence and approximately 170 feet from an open Coast Live Oak woodland habitat to the southeast. County staff was able to get additional manufacturer information from Caterpillar about the noise performance specifications of this proposed equipment. Appendix D included no noise specifications about this equipment.

The County finds that this project will exceed the property line sound level limits of the County Noise Ordinance (County Code Section 36.404). The project site and the adjacent land are zoned S-92, General Rural, a zone that allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels (dBA) from 10 p.m. to 7 a.m. County staff examined information about an open generator installation and an enclosed unit for this application. The open installation has three major noise sources, including the exhaust, the engine (mechanical), and the radiator fans. It is assumed that the radiator fans produce as much noise as the engine. Based on the Caterpillar specifications, the exhaust will generate 95 decibels at 49 feet and the engine will generate 92 decibels at the same distance. Estimates indicate that the combined levels for the open installation will be 98 decibels at 49 feet. If exhaust controls such as silencers were used for the open installation, a single generator would still generate 95 decibels at 49 feet. For the closed or packaged generator with sound attenuation, Caterpillar claims that a large generator of this size would generate no more than 74 decibels (A) at 50 feet. For either generator package, the proposed temporary installation would not be able to comply with the sound level limits of the County Noise Ordinance at any adjacent property line of the substation (day or night).

For the nearest residence, the 24-hour operation of these temporary generators exceeds the 60 decibel (A) CNEL exterior noise standard of the County Noise Element by more than 10 decibels. Other neighboring residences within 800 feet of the site may also experience significant noise impacts depending on the existing noise environment of the area. The environmental initial study concluded that the area is largely uninhabited and therefore construction noise impacts are less than significant. The area is inhabited and therefore the basis for the conclusion is incorrect.

For the adjacent Coast Live Oak Woodland habitat, the continuous hourly operation of these temporary generators would exceed the 60-decibel (A) threshold of the United States Fish and Wildlife Service for the noise sensitive habitat of migratory birds. The EA was not clear that noise generator noise impacts were considered and it may be necessary to consider additional mitigation measures.

Staff concludes that the reconductoring portion of the EA would generate significant noise impacts to neighboring properties, residents, and habitat from the use of these temporary generators. A more detailed analysis is required of these issues with suitable mitigation measures implemented to reduce these impacts to acceptable levels. The County strongly suggests that any future study include an analysis of the temporary impacts associated with the construction of the 69 KV line through the

County jurisdiction.

Thank you for your consideration of the County's concerns. Should you have questions, please contact Lory Nagem of my staff at (858) 694-3823.

Sincerely,

ERIC GIBSON, Deputy Director

cc: Donna Tisdale, P.O. Box 1275, Boulevard, CA 91905-1275  
Robert R. Copper, Deputy Chief Administrative Officer, M.S. A6  
Candis Compton, CAO Staff Officer, M.S. A6  
Joe Farace, Department of Planning and Land Use, M.S. O650  
John Bennett, Department of Planning and Land Use, M.S. O650

# Mountain windmill plan scrapped

## Public outcry over Volcan tests cited

By J. Harry Jones  
STAFF WRITER

**JULIAN** — A wind-energy company that was considering building a dozen huge windmills atop a mountain ridge near Volcan Mountain has withdrawn its application to conduct testing.

Michael Azeka, a project development official with San Diego-based AES Seawest Inc., said Tuesday that the public outcry after publicity about the project was one reason for abandoning it.

"We did get quite a bit of negative reaction from local residents, primarily because of the proximity to Volcan Mountain and visual concerns," Azeka said.

"Because of the many con-

cerns we found it difficult to take the next step."

The small size of the site, moderate winds in the area and the cost of the application also were factors, Azeka said.

Seawest had submitted an application with the Bureau of Land Management to build testing towers along a two- to three-mile ridge northeast of Banner Grade and less than a mile from the Volcan Mountain Preserve. If the tests had shown enough wind could be generated at the site to make a project financially viable, Seawest was considering building 10 to 12 steel towers, each 350 to 400 feet tall. Each windmill would have had held a generator attached to fiberglass blades 120 feet long.

The proposal was opposed by seven environmental groups, including the San Diego Sierra Club and the Center for Biological Diversity, which

filed a Freedom of Information Act request that revealed the plans earlier this year.

After news accounts of the project, a meeting was held at Julian Town Hall in early August. It was a standing-room-only crowd, and residents made it clear they didn't like the idea.

Concerns expressed at the meeting centered on fears that the windmills would be ugly and a threat to migratory birds and bats that might be killed by the spinning blades.

Tuesday, opponents of the plan celebrated.

"We're ecstatic," said Jeannette Hartman, a member of a new citizen's organization called the Julian Energy Group. "It's unusual to have such a fast success in this kind of work. It proves the ability of the Julian community to organize itself."

"We are very pleased, and

we think Seawest made a responsible decision," said Kelly Fuller of the Sierra Club.

But Fuller and others said this might be just the first battle about wind energy on the ridge.

Lynda Kastoll, a real estate specialist with the bureau, said other wind-energy companies have expressed interest in the site. The bureau does not have any applications now, she said, but it is possible another company will come forward with a request to conduct testing.

Fuller said she hopes that the federal government "acts as responsibly as Seawest" and will consider making the site off-limits to any wind-energy development.

---

J. Harry Jones: (760) 737-7579;  
jharry.jones@uniontrib.com

# Wind Farm Application Withdrawn

## Volcan Mountain Preserve Board Votes to Oppose Any Such Project

by Bob Stuart, Senior Contributing Writer

On Tuesday, September 27th AES SeaWest, the alternative energy firm that had filed an application with the Federal Bureau of Land Management (BLM) to run tests on the wind on the Banner ridge east of Julian, withdrew their application. Word of this action was provided by Lynda Kastoll with the El Centro office of the BLM.

Mike Azeka, who represented SeaWest at a Julian Town Hall meeting on this project recently, stated that, "After considering all the factors ... raised on the BLM

Banner Grade application for wind energy testing and monitoring, we have decided to withdraw our application to BLM. The reasons for this decision include the concerns that citizens have for preserving the visual integrity of the area, the limited size of the site, the limited environmental benefit of the energy that would be produced (due to the relatively small site size and moderate

wind potential), and the costs of pursuing the application. This terminates our company's future plans for wind energy testing on BLM lands in San Diego and Imperial counties."

However, Kastoll also indicated that, "Others have expressed interest in the same lands over the last year or so, but there is no formal waiting list .... But if an application is submitted we will have to deal with it."

If SeaWest had been successful in obtaining BLM ultimate approval for wind turbines on the Banner ridge, 10 to 12 towers 350 to 400 feet tall would have been installed with blades over 100 long.

Some of the strongest objections to a wind farm in this area were that it would have been in a flyway for migrating birds and would have killed thousands of them along with a large number of bats.

*continued on page 8*

## Volcan Mountain Preserve Finally Speaks On Wind Farm

The Volcan Mountain Preserve Foundation (VMPF) voted at the last board meeting (9/20/05) to officially oppose the proposed wind farm on BLM land along the Banner Canyon Ridgeline. VMPF will also oppose any other applications for testing sites on the Mountain, as our opposition does not depend on whether the sites are windy enough or if they have commercial value.

Our mission statement is clear. It is VMPF's goal to preserve all of Volcan Mountain in its natural state for all generations. The wind farm would represent a serious intrusion to the wilderness values of the Mountain. VMPF will oppose any development on Volcan Mountain unless it can be proven that it will actually enhance the biological and hydrological values of the Mountain.

The individual board members of the Foundation are all very supportive of alternative energy. Energy derived from wind farms can bring many positive contributions to society, such as renewable energy that does not contribute to global warming, air pollution, strip mining, geo-political conflicts and other associated ills. However, the Board believes that these energy projects still need to be carefully located in areas that have little biological or wilderness values. A suggestion might be the vast desert plains east of Anza Borrego Desert State Park.

Greg Schuett  
President

News  
10/05/05

## Windfarm

*continued from page 1*

Jack Shelver, who chairs the Julian Community Planning Group (JCPG), has been authorized to submit a letter to BLM asking that his group be kept informed of any wind farm developments in the vicinity of Julian.

The Volcan Mountain Preserve Foundation Board (VMPFB) has taken a position of opposition to any such projects on Volcan Mountain by overwhelming consensus. Greg Schuett, who is the Chair of that Board states that, "After careful research the VMPFB voted to oppose this and any other wind mill application on Volcan Mountain based on our mission statement; 'to protect and preserve Volcan Mountain in its' natural state for all generations'."

According to an article in The San Diego Union-Tribune on September 28th, the SeaWest application had been opposed by seven different environmental groups, including the Sierra Club and the Center for Biological Diversity.



**SAN DIEGO AUDUBON SOCIETY**  
4891 Pacific Highway, Suite 112 • San Diego CA 92110 • 619/682-7200

**SDAS Position Statement on Proposed San Diego County Wind Farms**  
August 07, 2005

The San Diego Audubon Society (SDAS) supports the development of wind energy in principle. We recognize it to be a relatively non-polluting form of renewable energy that can help address the problems of foreign oil dependency and global climate change.

However, we will not support proposed wind farm sites that are within, adjacent to, or will adversely affect, state or federal natural areas, wildlife preserves, significant habitat or floristic areas, important cultural or religious sites, or undeveloped or roadless areas of particular beauty, recreational, or resource value.

In light of the above, SDAS cannot support currently proposed wind farm developments within San Diego County in the McCain Valley, Table Mountain, or Banner Canyon areas, as they involve one or more of the characteristics outlined in the preceding paragraph. We hope more appropriate sites can be identified for these proposed developments.

In general, we are particularly concerned about the potential of wind farms to inflict high levels of mortality on raptors and other birdlife, and also bats, as has been well documented at such locations as Altamont Pass. Local proposals must, as part of their Environmental Impact Statements, specify how bird and bat deaths will be avoided (not mitigated, but avoided).

We endorse the provision adopted at Altamont Pass of shutting down machines at times of high bird or bat activity. A similar provision should be incorporated into San Diego County wind farm proposals. There should also be life-of-project monitoring of bird/bat fatalities, with mandatory shut-downs required if significant problems occur.

As part of the above, we strongly urge that bird and bat activity in the vicinity of any proposed wind farm start to be studied and monitored at the same time that any windspeed test towers are constructed at that site, including adverse effects of the test towers themselves.

Thank you for your consideration of, and response to, these comments.

For the San Diego Audubon Society

A handwritten signature in black ink, appearing to read "James A. Peugh".

James A. Peugh  
Conservation Committee Chair

AUGUST 11, 2005

## **VIEWPOINT**

### **Placement of wind-energy critical**

Backcountry residents who love wildlife and wide open views of rich natural landscapes should know that wind-energy testing is now under way on Vista Irrigation District land on a prominent ridge at the north end of the Vulcan Mountains just west of San Felipe.

One meteorological testing tower is visible on a ridge just west of the intersection of San Felipe Road and Montezuma Valley Road and another from the intersection of San Felipe Road and Hwy 79 (to the SE towards the Mataguay Boy Scout Camp). A review of VID Board minutes confirms that these are wind energy testing facilities.

*See VIEWPOINT, Page 22*

AUGUST 11, 2005

### **VIEWPOINT: Wind turbines out of place at Banner, Ranchita**

*Continued from Page 6*

Wind energy companies are conducting a detailed search for new turbine sites in San Diego County, much like those around Palm Springs and Altamont Pass near the Bay Area. Testing towers have been installed near Jacumba and in the McCain Valley near Boulevard. One company is seeking a BLM permit for testing towers along the length of a Vulcan Mountain ridge visible from Banner Grade. The same company has also sought BLM permits for testing in the San Ysidro Mountains above Ranchita and now on VID land. New transmission lines will be needed to deliver wind energy to the city.

Poorly located wind turbines at Altamont Pass and elsewhere have resulted in significant deaths of raptors and bats, and new generation turbines are very tall, very industrial (ugly), and visible for miles. Wind energy might be a good idea in concept, but new facilities should be located away from bird migration corridors, concentrations of raptors and bats, and pristine natural land and viewsheds. These conditions suggest that back country residents should reasonably oppose wind turbines on VID land and Banner Grade.

**DAVID HOGAN**  
**Urban Wildlands Program**  
**Director**  
**Center for Biological Diversity**  
**San Diego**